

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WILLIAM JAMESON, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

Civil Action No.: 2:02-CV-2802-HH

JOHN J. RIGAS, MICHAEL J. RIGAS,
TIMOTHY J. RIGAS, and JAMES P. RIGAS,

Defendants.

ERNEST PEDATA, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

Civil Action No.: 2:02-CV-2901-HH

JOHN J. RIGAS, MICHAEL J. RIGAS,
TIMOTHY J. RIGAS, and JAMES P. RIGAS,

Defendants.

DAVID SORENSON, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

Civil Action No.: 2:02-CV-3158-HH

JOHN J. RIGAS, MICHAEL J. RIGAS,
TIMOTHY J. RIGAS, and JAMES P. RIGAS,

Defendants.

[Captions continued on next page]

**MOTION OF THE WELLSVILLE GROUP
TO CONSOLIDATE ACTIONS, TO BE APPOINTED LEAD PLAINTIFFS,
FOR APPROVAL OF LEAD PLAINTIFFS' SELECTION OF CO-LEAD COUNSEL**

BRIAN SMITH and DANA SMITH, on behalf of :
themselves and all others similarly situated, :

Plaintiffs, :

v. :

JOHN J. RIGAS, MICHAEL J. RIGAS, :
TIMOTHY J. RIGAS, and JAMES P. RIGAS, :

Defendants. :

KURT MEYLE, on behalf of himself and all :
others similarly situated, :

Plaintiff, :

v. :

JOHN J. RIGAS, MICHAEL J. RIGAS, :
TIMOTHY J. RIGAS, and JAMES P. RIGAS, :

Defendants. :

JEFFREY J. HYSLIP, on behalf of himself and :
all others similarly situated, :

Plaintiff, :

v. :

JOHN J. RIGAS, MICHAEL J. RIGAS, :
TIMOTHY J. RIGAS, and JAMES P. RIGAS, :

Defendants. :

[Captions continued on next page]

Civil Action No.: 2:02-CV-3211-HH

Civil Action No.: 2:02-CV-3699-HH

Civil Action No.: 2:02-CV-3768-HH

SCOTT BURNSIDE, on behalf of himself and all others similarly situated,	:	
	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.: 2:02-CV-3769-HH
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS,	:	
	:	
Defendants.	:	
WILLIAM H. SPADAFORA, on behalf of himself and all others similarly situated,	:	
	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.: 2:02-CV-3858-HH
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS,	:	
	:	
Defendants.	:	

Adelphia Business Solutions, Inc. (“Adelphia Business Solutions”) investors Jeffrey Hyslip, John Hyslip, Joseph Hyslip, Rance Backster, Larry Walsh, Richard Bokman, John Dewaileebe and Norman Preston (the “Wellsville Group”) (the “Proposed Lead Plaintiffs” or “Movants”) hereby move this Court pursuant to Section 21D of the Securities Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”):

- a. to consolidate for all purposes the above-captioned related actions (collectively, “the Related Actions”) filed on behalf of purchasers of the securities of Adelphia Business Solutions between January 6, 2000 and March 27, 2002;
- b. to appoint the Wellsville Group as Lead Plaintiffs in the above-captioned related actions;

- c. to approve Schifffrin & Barroway, LLP, as Co-Lead Counsel; and
- d. to approve Wolf Haldenstein Adler Freeman & Herz, LLP, the law firm selected and retained by the Wellsville Group as Co-Lead Counsel.

This Motion is supported by the accompanying Memorandum of Law, the accompanying Affidavit of Darren J. Check, and the exhibits annexed thereto, all of the prior pleadings and proceedings had herein, and such other written and/or oral argument, as may be presented to the Court.

Dated July 9, 2002

Respectfully submitted,

SCHIFFFRIN & BARROWAY, LLP

By:

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Proposed Co-Lead Counsel

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